

1 PETER W. ALFERT, ESQ.

*Admitted Pro Hac Vice*

2 IAN A. HANSEN, ESQ.

*Admitted Pro Hac Vice*

3 909 Marina Village Parkway, #199

4 Alameda, CA 94501

5 MARIANNE C. LANUTI, ESQ.

Nevada Bar No. 7784

6 LAW OFFICES OF MARIANNE C. LANUTI

194 Inveraray Court

7 Henderson, NV 89074

8 TODD BOLEY, ESQ.

*Admitted Pro Hac Vice*

9 LAW OFFICES OF TODD BOLEY

10 2831 Mariner Square Drive, Suite 280

Alameda, CA 94501

11 *Attorneys for Plaintiffs*

12  
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 BROOK M. HURD, GERALDINE C. HURD,  
16 and M.H., a minor, by and through her guardian  
ad litem, BROOK M. HURD; LUIS O.

VILLALOBOS; OLIVIA N. ESPINOZA;

17 L.M.V., a minor, by and through his guardian ad  
litem, OLIVIA N. ESPINOZA; ZEKROLLAH

18 SANA EI, ELHAM EGH DAMIAN; and S.S., a

19 minor, by and through his guardian ad litem,

ZEKROLLAH SANA EI,

20 Plaintiffs,

21 vs.

22 CLARK COUNTY SCHOOL DISTRICT;

23 JAMES P. DORAN; and SHAWN PAQUETTE,

24 Defendants.

Case No. 2:16-cv-02011-GMN-PAL

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING SETTLEMENT  
RELATED DEADLINES**

**[FIRST REQUEST]**

25 Plaintiffs, BROOK M. HURD, GERALDINE C. HURD, and M.H., a minor, by and through  
26 her guardian ad litem, BROOK M. HURD; LUIS O. VILLALOBOS; OLIVIA N. ESPINOZA; L.M.V.,  
27 a minor, by and through his guardian ad litem, OLIVIA N. ESPINOZA; ZEKROLLAH SANA EI,

1 ELHAM EGH DAMIAN; and S.S., a minor, by and through his guardian ad litem, ZEKROLLAH  
2 SANAEI, and Defendant, Clark County School District (“CCSD”) (collectively, the “Parties”), by and  
3 through its undersigned counsel of record, hereby stipulate and agree as follows:

4 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action as  
5 follows:

6 1. Subject to approval by the CCSD Board, the parties reached an agreement to settle  
7 the above matter at a settlement conference on November 8, 2018.

8 2. On November 14, 2018, the Court issued a Minute Order setting forth the terms of  
9 that agreement. The agreement provides that the plaintiffs shall file a petition for compromise of  
10 the minors’ claims within 30 days of the School Board’s approval of the proposed settlement. In  
11 addition, Plaintiffs are to file an application for attorneys’ fees and costs within 30 days of the  
12 Board’s approval if the settlement is approved.

13 3. The parties held a status conference on January 16, 2019. At that time, the parties  
14 indicated that the CCSD Board would consider the settlement on January 24, 2019.

15 4. The court’s Minutes of Proceedings (Document 162) directs the parties to file a  
16 stipulation to dismiss by January 30, 2019 if all parties have executed the settlement agreement.  
17 It further directed the Plaintiffs to file a motion to enforce the settlement by January 30, 2019 if  
18 Defendant Doran is unwilling to sign the agreement on terms memorialized in chambers.

19 5. Due to unforeseen circumstances, the CCSD Board will consider the proposed  
20 settlement during its meeting on February 14, 2019 instead of the January 24, 2019 meeting as  
21 originally anticipated. Counsel for Plaintiffs and CCSD have agreed on the terms of the  
22 settlement agreement and on January 21, 2019, counsel for Plaintiffs sent CCSD copies of the  
23 settlement agreement and release executed by all Plaintiffs and by plaintiffs’ counsel.

24 6. Attorneys for the Plaintiffs and Defendant Doran have now reached agreement on  
25 the terms of the settlement agreement and no motion to enforce the agreement will be necessary.

26 7. The case cannot be dismissed until the Court rules on Plaintiffs petitions to approve  
27 the minors’ compromises and application for attorney’s fees and costs. Therefore, the parties  
28 request that the deadline to file a stipulation for dismissal be extended to 30 days after the approval

of either the petition for minors' compromises or the application for fees and costs, whichever is later.

8. In addition, the parties request that a status check be scheduled after February 14, 2019.

<p>DATED this 28th day of January, 2019.</p> <p>GREENBERG TRAURIG, LLP</p> <p><u>/s/ Kara B. Hendricks</u></p> <p>MARK E. FERRARIO, ESQ. Nevada Bar No. 1625</p> <p>KARA B. HENDRICKS, ESQ. Nevada Bar No. 7743</p> <p>WHITNEY L. WELCH-KIRMSE, ESQ. Nevada Bar No. 12129</p> <p>10845 Griffith Peak Dr., #600 Las Vegas, NV 89135</p> <p><i>Attorneys for Defendants Clark County School District and Shawn Paquette</i></p>	<p>DATED this 28th day of January , 2019.</p> <p>LAW OFFICES OF PETER ALFERT, PC</p> <p><u>/s/ Peter W. Alfert</u></p> <p>PETER W. ALFERT, ESQ. <i>Admitted Pro Hac Vice</i></p> <p>IAN A. HANSEN, ESQ. <i>Admitted Pro Hac Vice</i></p> <p>909 Marina Village Parkway, #199 Alameda, CA 94501</p> <p>MARIANNE C. LANUTI, ESQ. Nevada Bar No. 7784</p> <p>LAW OFFICES OF MARIANNE C. LANUTI 194 Inveraray Court Henderson, NV 89074</p> <p>TODD BOLEY, ESQ. <i>Admitted Pro Hac Vice</i></p> <p>LAW OFFICES OF TODD BOLEY 2831 Mariner Square Drive, Suite 280 Alameda, CA 94501</p> <p><i>Attorneys for Plaintiffs</i></p>
<p>DATED this 28th day of January, 2019.</p> <p>HATFIELD &amp; ASSOCIATES</p> <p><u>/s/ Trevor J. Hatfield</u></p> <p>TREVOR J. HATFIELD, ESQ. Nevada Bar No. 7373</p> <p><i>Attorneys for Defendant James Doran</i></p>	

**ORDER**

The deadline for dismissal is extended to 30 days after the approval of either the petition for minors' compromises or the application for fees and costs, whichever is later.

A status check is scheduled for **1:45 p.m. February 19, 2019**, in Courtroom 3B.

**IT IS SO ORDERED:**

**Dated:** January 29, 2019

  
**UNITED STATES MAGISTRATE JUDGE**